



11-CV-00872-MISC

**THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

**DEBORAH R BEATON,**

Plaintiff(s),

v.

**JP MORGAN CHASE BANK, N.A.,  
NORTHWEST TRUSTEE SERVICES, INC.**

Defendant(s).

CASE NO. 2:11-cv-00872-RAJ

**PLAINTIFF'S PROPOSED PLAN FOR  
DISCOVERY AND DEPOSITIONS**

Plaintiff hereby submits the following proposal for the substance of the discovery and depositions as required by the Court's order and FRCP 26f. Plaintiff requests that Defendants produce and allow for inspection and copying the following documents and tangible things designated below that are, or should be, in the possession, custody and/or control of the Defendant, JP MORGAN CHASE BANK, N.A. and NORTHWEST TRUSTEE SERVICES, INC.:

1. Please produce any and all documents, records and any other pertinent information in regard to the accounting of subject alleged loan.
2. Produce all signed notarized retainer agreements between Defendants and their respective counsel in regard to this particular case.

PLAINTIFF'S PURPOSED PLAN FOR  
DISCOVERY AND DEPOSITIONS

**Deborah R Beaton  
Plaintiff Pro Se  
31431 SW 46<sup>th</sup> Pl  
Federal Way, WA 98023**

3. Produce the secured lien registered in with the Washington Secretary of State, UCC DIV., and county auditor against Plaintiff(s), as debtor(s), Ens Legis, as stated in the Notice of Default.
4. Produce the "Bailee" letters given to and from the Defendant in regards to the alleged loan.
5. Produce a copy of any Indenture Trustee T-1 Forms in regards to the alleged loan.
6. Produce the document that proves the Defendant and/or the Defendant's predecessors lent and/or loaned anything of value to Plaintiff's.
7. Produce the original loan application showing the account CUSIP number.
8. Produce the original Note which proves Plaintiff(s) signed a Deed of Trust with the Defendant and/or the Defendant's predecessors.
9. Produce documents that prove the Defendant is damaged by Plaintiff(s), i.e., Beneficiary's Declaration of Default.
10. Produce all Delivery and Acceptance Receipts relating to the subject Note.
11. Produce all riders that attach to or belong with the original Note.
12. Produce all allonges (or allonge type documents/instruments) that attach to or belong with the original Note.
13. Produce of the original Deed of Trust.
14. Produce all Delivery and Acceptance Receipts relating to the subject Deed of Trust.
15. Produce of all assignments of the subject Deed of Trust.
16. Produce the Notary Journal wherein each execution of each assignment of the subject Deed of Trust was logged.

PLAINTIFF'S PURPOSED PLAN FOR  
DISCOVERY AND DEPOSITIONS

**Deborah R Beaton**  
**Plaintiff Pro Se**  
31431 SW 46<sup>th</sup> Pl  
Federal Way, WA 98023

- 1 17. Produce the Corporate Resolution or other instrument which purports to give the
- 2 executor of each assignment of subject Deed of Trust a signatory authority.
- 3 18. Produce the county auditor's file number under which each assignment of the
- 4 subject Deed of Trust was recorded.
- 5 19. Produce a copy of original receipt issued to Plaintiff(s) for deposit of the original
- 6 Note with the Defendant and/or Defendant's predecessors.
- 7 20. Produce a copy of the Defendant's and/or Defendant's predecessors cancelled loan
- 8 check endorsed by Plaintiff.
- 9 21. Produce a certified accounting showing exactly how Plaintiff's original Note was
- 10 accounted for on the books of the Defendant and/or Defendant's predecessors.
- 11 22. Produce original Notice of Default for Trustee's Sale.
- 12 23. Produce original Appointment of Trustee.
- 13 24. Produce signatory authority to appoint Successor Trustee.
- 14 25. Produce all documents, instruments, account and paper work delivered to the
- 15 Successor Trustee in relation to the Trustee Sale.
- 16 26. Produce signatory authority to issue the said Notice of Trustee Sale.
- 17 27. Produce original Trustee's Deed (if any).
- 18 28. Produce Notary(s) journals for each and every notarized signature which Defendant
- 19 relies upon;
- 20 29. Proof of Claim that Defendant is not liable for TILA violations described in the
- 21 Plaintiff's Verified Complaint and Forensic Audit Report.
- 22 30. Proof of Claim that Defendant is not liable for HOEPA violations (if any) described in
- 23
- 24
- 25
- 26

PLAINTIFF'S PURPOSED PLAN FOR  
DISCOVERY AND DEPOSITIONS

**Deborah R Beaton**  
**Plaintiff Pro Se**  
31431 SW 46<sup>th</sup> Pl  
Federal Way, WA 98023

the Plaintiff's Verified Complaint and Forensic Audit Report.

31. Proof of Claim that Defendant is not liable for RESPA violations described in the Plaintiff's Verified Complaint and Forensic Audit Report.

32. Proof of Claim that Defendant is not liable for Predatory Lending violations described in the Plaintiff's Verified Complaint and Forensic Audit Report.

The Plaintiff requires the above described documents, records and proof to ensure that all culpable, responsible and liable parties are joined as defendants in this matter, i.e. notaries, signatories, trustees, nominees, beneficiaries, etc. Plaintiff is not the custodian of records and thus requires production of such records to support and evidence Plaintiff's knowledge of fraudulent, predatory and suspicious lending and financial activities in an admissible fashion which may well reveal actual criminal intent and actual criminal acts punishable by fines and imprisonment that must be reported and prosecuted accordingly. Hence, the most intricate and detailed type and level of discovery and depositions are required by Plaintiff in this instant matter.

Respectfully submitted <sup>October</sup>~~September~~ 5, 2011,

FOR: DEBORAH R BEATON, PLAINTIFF

BY: 

PLAINTIFF'S PURPOSED PLAN FOR  
DISCOVERY AND DEPOSITIONS

Deborah R Beaton  
Plaintiff Pro Se  
31431 SW 46<sup>th</sup> Pl  
Federal Way, WA 98023